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September 3, 1999

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas, Secretary  
Federal Communications Commission  
The Portals Building, Room TW-A325  
445-12th Street, S.W.  
Washington, DC 20554

Re: MM Docket No. 99-25  
Creation of a Low Power Service  
Request for Extension of Time

This letter is written on behalf of Greater Media, Inc. ("Greater Media") to request action at this time on its outstanding request for an extension of time for the filing of reply comments in the above-referenced proceeding from September 1, 1999, for a period of 60 days, to and including November 1, 1999, or for a period of forty-five 45 days after the release of Notice of Proposed Rule Making respecting implementation of in-band on-channel digital audio broadcasting ("IBOC DAB"), whichever is later.

In its August 31, 1999 Order (FCC 99-233) granting an additional 16 days until September 17, 1999, the Commission stated that

[w]e are committed to developing a complete record in this proceeding and recognize that technical studies of digital audio broadcasting may facilitate the identification of the range of potential digital radio design options. In granting a 60-day extension of the comment period, however, we acknowledged that the testing required for these studies was not likely to be completed by conclusion of this proceeding. If, at a later date, subsequent developments or additional information suggests that a further extension of the reply comment period or a re-opening of the comment period is warranted, we will consider Greater Media's request for a substantially longer extension of time or other requests for extension or reopening, at that time.

The Commission's grant of a limited extension focused on the digital issue. In this regard, Greater Media notes that on August 23, 1999, USDAR filed comments in support of Greater Media's extension request which do not appear to have been considered by the Commission.

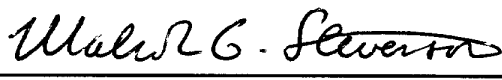
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However, wholly apart from this issue is Greater Media's more immediate concern, stated in its extension request, that the limited extension simply does not permit sufficient time for meaningful review and comment on the voluminous record compiled at the comment stage of this proceeding, consistent with the Commission's stated commitment to "a complete record". That record is now comprised of some 1600 comments and well over 7000 pages to be reviewed, including detailed and complex technical analyses.<sup>1</sup> For this reason alone, Greater Media submits that grant of its extension request at this time is warranted.

Accordingly, Greater Media respectfully requests favorable action at this time on its outstanding extension request.

Respectfully submitted,

SCHWARTZ, WOODS & MILLER

By:   
Malcolm G. Stevenson

MGS/lge

cc: Chairman William Kennard, Room 8-B201  
Commissioner Gloria Tristani, Room 8-C302  
Commissioner Michael Powell, Room 8-A204  
Commissioner Susan Ness, Room 8-B115  
Commissioner Harold Furchtgott-Roth, Room 8-A302  
Roy Stewart, Chief, Mass Media Bureau, Room 2-C347  
Tom Powers, Esq., Room 8-B201  
Rick Chesson, Esq., Room 8-C302  
Marsha MacBride, Esq., Room 8-A204  
David Goodfriend, Esq., Room 8-B115  
Helgi Walker, Esq., Room 8-A302

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<sup>1</sup> In this regard, the Commission was still placing comments on the ECFS system on August 12, 1999 and accessing the ECFS for such a large body of material is difficult and time-consuming.